

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, *et al.*,)
)
)
Plaintiffs,)
)
v.) Civil Action No. 04cv397 (GBD) (RLE)
)
THE PALESTINE LIBERATION)
ORGANIZATION, *et al.*,)
)
Defendants.)
)
)

**DEFENDANTS' FIRST REQUEST FOR THE PRODUCTION
OF DOCUMENTS AND THINGS TO THE BAUER PLAINTIFFS**

Pursuant to Federal Rule of Civil Procedure 34, Defendants the Palestinian Authority (“PA”) and the Palestine Liberation Organization (“PLO”), through counsel, request that the Bauer Plaintiffs produce the documents described below at the offices of Miller & Chevalier Chartered, 655 Fifteenth Street, NW, Suite 900, Washington, D.C., 20005 (attention: Brian A. Hill, Esq.) within thirty (30) days of the service of these requests.

GENERAL DEFINITIONS

1. “Communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).
2. “Document” is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

13. "Shehadeh" means the person identified in Paragraph 90 of the First Amended Complaint.

14. "Sadi" means the person identified in Paragraph 91 of the First Amended Complaint.

15. "Civil Action" means the above-captioned action.

REQUESTS FOR DOCUMENTS AND THINGS

1. All documents concerning the March 21, 2002 Bombing.
2. All documents concerning Hashaika.
3. All documents concerning Abdel Aweis.
4. All documents concerning Shawish.
5. All documents concerning Tirawi.
6. All documents concerning Al-Shaykh.
7. All documents concerning Shehadeh.
8. All documents concerning Sadi.
9. All documents concerning the JOHN DOE defendants.
10. All documents concerning Defendants' involvement in or support for the March 21, 2002 Bombing.

11. All documents concerning any investigations by Israeli police, security, military or other governmental or law enforcement authorities into the March 21, 2002 Bombing.

12. All documents concerning any confessions, prosecutions and/or convictions of individuals in connection with the March 21, 2002 Bombing.

10. These requests apply to and require the production of all responsive electronic data (including all active files, deleted files and fragmentary files) on any computer, network or electronic media.

11. Unless otherwise indicated, these requests refer and relate to the time period from the beginning of the circumstances and events alleged in the First Amended Complaint until the date of your responses (including any required supplementation thereof) or the completion of your production of documents, whichever is later.

12. Your responses to these requests should be amended or supplemented in accordance with Federal Rule of Civil Procedure 26(e).

August 25, 2011

Respectfully Submitted,

MJR

Mark J. Rochon
Richard A. Hibey
Laura G. Ferguson
Brian A. Hill
MILLER & CHEVALIER CHARTERED
655 15th Street, NW, Suite 900
Washington D.C. 20005-6701
(202) 626-5800 [tel]
(202) 626-5801 [fax]
mrochon@milchev.com [email]

*Counsel for Defendants the Palestinian Authority and the
Palestine Liberation Organization*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 25, 2011, a true and genuine copy of the foregoing document was sent by first-class United States mail to:

Robert J. Tolchin, Esq.
The Berkman Law Office, LLC
111 Livingston Street — Suite 1928
Brooklyn, NY 11201

Attorneys for Plaintiffs

759A

Brian A. Hill